

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SHORELINE AVIATION, INC.,

Plaintiff,

- against -

CYNTHIA L. HERBST, SOUND AIRCRAFT
FLIGHT ENTERPRISES, INC. and RYAN A.
PILLA,

Defendants.

Case No. 2:20-cv-02161-NJC-SIL

**DECLARATION OF ALEX
KRIEGSMAN**

I, Alex Kriegsmann, declare, under penalty of perjury, as follows:

1. I am an attorney with the law firm Kriegsmann PC, attorneys for Plaintiff Shoreline Aviation, Inc. in the above-captioned action.
2. I make this declaration based upon my personal knowledge of the facts and events stated herein.
3. A true and correct copy of excerpts of the transcript of the deposition of Andrea Collingwood on March 30, 2022 is attached as **Exhibit 1**.
4. A true and correct copy of a document bearing the Bates numbers SAI007979 through SAI007983 is attached as **Exhibit 2**.
5. A true and correct copy of a document bearing the Bates numbers SAI007984 through SAI007988 is attached as **Exhibit 3**.
6. A true and correct copy of excerpts of the transcript of the deposition of Mike Migliore on March 14, 2022 is attached as **Exhibit 4**.

7. A true and correct copy of a document bearing the Bates numbers BLADE 0000377 through BLADE 0000389 is attached as **Exhibit 5**.

8. A true and correct copy of a document bearing the Bates number SAFE00003475 is attached as **Exhibit 6**.

9. A true and correct copy of Defendants' Response to Plaintiff's Statement of Undisputed Material Facts in Support of Plaintiff's Motion for Summary Judgment, dated October 27, 2023, is attached as **Exhibit 7**.

10. A true and correct copy of a document bearing the Bates numbers SAFE00000434 through SAFE00000470 is attached as **Exhibit 8**.

11. A true and correct copy of the complaint filed in *Herbst et al. v. Tuma et al.*, Index No. 616650/2018 (Sup. Ct., Suffolk County 2018) is attached as **Exhibit 9**.

12. A true and correct copy of Defendants' Statement of Undisputed Material Facts Pursuant to Local Rule 56.1 in Support of Their Motion for Summary Judgment is attached as **Exhibit 10**.

13. A true and correct copy of a document bearing the Bates number SAI003162 through SAI003233 is attached as **Exhibit 11**.

14. A true and correct copy of a document bearing the Bates number SAI007775 through SAI007776 is attached as **Exhibit 12**.

15. A true and correct copy of a list of the 160 customers from SAI003162-3233 and SAI007775-76 that also appear in SAFE00000434-70 is attached as **Exhibit 13**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 30, 2025

/s/ Alex Kriegsman

Alex Kriegsman